

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

ALLSTATE INSURANCE COMPANY;  
ALLSTATE PROPERTY AND  
CASUALTY INSURANCE COMPANY;  
ALLSTATE FIRE AND CASUALTY  
INSURANCE COMPANY; ESURANCE  
INSURANCE COMPANY; and  
ESURANCE PROPERTY AND  
CASUALTY INSURANCE COMPANY,

No: 19-cv-13721  
Hon. Linda V. Parker

Plaintiffs,

vs.

INSCRIBED PLLC; INTEGRATIVE  
NEUROLOGY PLLC; DIAGNOSTIC  
SOLUTIONS LLC; WOOK KIM, M.D.,  
P.C. d/b/a FARMBROOK  
INTERVENTIONAL PAIN & EMG;  
DETROIT INSTITUTE OF PAIN  
MUSCULOSKELETAL MEDICINE  
PLLC; MICHIGAN INSTITUTE OF  
MUSCULOSKELETAL MEDICINE  
PLLC; ZMC PHARMACY, L.C.C.;  
INTEGRA LAB MANAGEMENT  
LLC; GIREESH VELUGUBANTI,  
M.D.; ARVINDER DHILLON, M.D.;  
BACHU ABRAHAM, M.D.; AND  
JALAL ZAWAIDEH, R.PH.,

Defendants.

---

**ANSWER TO COMPLAINT, AFFIRMATIVE DEFENSES, AND  
RELIANCE UPON JURY DEMAND BY DEFENDANTS WOOK KIM,  
M.D., P.C., D/B/A FARMBROOK INTERVENTIONAL PAIN & EMG, AND  
DR. ARVINDER DHILLON, M.D.**

NOW COME Defendants Wook Kim, M.D., P.C., d/b/a Farmbrook Interventional Pain & EMG (“Farmbrook”) and Dr. Arvinder Dhillon, M.D. (“Dr. Dhillon”) (together “Defendants”), by and through their attorneys, and for their Answer to Plaintiffs’ Complaint, state as follows:

## **INTRODUCTION**

1. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs Allstate Insurance Company, Allstate Property and Casualty Insurance Company, Allstate Fire and Casualty Insurance Company, Esurance Insurance Company, and Esurance Property and Casualty Insurance Company (together “Plaintiffs” or “Allstate”) to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.<sup>1</sup> Plaintiffs’ motivation in filing this lawsuit is to attempt to circumvent the requirements of the Michigan No-Fault Act and unlawfully extort from Defendants a billing moratorium that will allow Plaintiffs to continue to collect exorbitant insurance premiums while refusing to pay benefits for its insureds.

---

<sup>1</sup> See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan

2. Defendants deny the allegations in this paragraph as untrue and specifically deny all allegations of wrongdoing, conspiracy, or fraudulent conduct on the part of Defendants, as well as their alleged involvement in any “fraud scheme.”

3. Defendants deny the allegations in this paragraph as untrue and specifically deny all allegations or implications of wrongdoing or fraudulent conduct on the part of Defendants, as well as their alleged involvement in any “fraudulent scheme.”

4. Defendants deny the allegations in this paragraph as untrue and specifically deny all allegations or implications of wrongdoing or fraudulent conduct on the part of Defendants, as well as their involvement in any “fraudulent scheme.”

5. Defendants deny the allegations in this paragraph as untrue and specifically deny all allegations or implications of wrongdoing, improper or unlawful solicitation, or fraudulent conduct on the part of Defendants, as well as their alleged pursuit of any “fraudulent objective.”

6. Defendants deny the allegations in this paragraph as untrue and specifically deny all allegations or implications of wrongdoing, fraudulent conduct on the part of Defendants, and their use of an alleged improper “predetermined protocol,” a term invented by the insurance company attorneys as a mechanism to circumvent the Michigan No-Fault Act.

7. Defendants deny the allegations in this paragraph as untrue and specifically deny all allegations or implications of wrongdoing or fraudulent conduct or fraudulent billing practices on the part of Defendants, or their alleged use of “fraudulent billing practices.”

8. Defendants deny the allegations in this paragraph as untrue and specifically deny all allegations or implications of wrongdoing or fraudulent conduct. In further response, Defendants state that Plaintiffs’ allegations of excessive charges are intentionally misleading as Plaintiffs pay medical providers based on Plaintiffs’ insurer driven payment amounts.

9. Defendants deny the allegations in this paragraph as untrue and specifically deny all allegations or implications of wrongdoing. In further response, Defendants state that Plaintiffs’ denial of claims is improper and not based on review of each claim as required by the Michigan No Fault Act and is instead part of Plaintiffs’ predetermined protocol to deny claims for which they are liable.

10. Defendants deny the allegations in this paragraph as untrue. In further response, Defendants state that Plaintiffs’ allegation of “reliance” is false because Plaintiffs did not pay some or all of the claims submitted by Defendants as part of Plaintiffs’ predetermined protocol and, as to the claims paid, Plaintiffs paid the amounts Plaintiffs determined were reasonable and customary for the services rendered.

11. Defendants deny the allegations in this paragraph as untrue. Defendants specifically deny participating in any alleged conspiracy or “fraudulent scheme.”

12. Defendants deny the allegations in this paragraph as untrue. Defendants specifically deny intentionally undertaking any wrongful acts or omissions as alleged by Plaintiffs.

13. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants deny perpetrating any “fraud scheme” as alleged by Plaintiffs.

14. In the manner and form alleged, Defendants deny the allegations in this paragraph as untrue. For further response, Defendants deny perpetrating any “fraudulent scheme” as alleged by Plaintiffs.

15. The allegations and counts alleged in Plaintiffs’ Complaint are self-explanatory and are denied by Defendants. For further response, Defendants deny all allegations of fraud, wrongdoing, violations of the RICO Act, conspiracy, and all allegations that Defendants caused harm or damages to Plaintiffs as untrue.

16. The allegations and claim for damages alleged in Plaintiffs’ Complaint are self-explanatory and are denied by Defendants. For further response, Defendants deny any and all allegations of wrongdoing or fraud as untrue and deny liability for any damages alleged by Plaintiffs.

17. The allegations and claim for declaratory relief alleged in Plaintiffs' Complaint are self-explanatory and are denied by Defendants. For further response, Defendants deny any and all allegations of wrongdoing or fraud as untrue, deny that Defendants caused Plaintiff any damages, and deny that Plaintiffs are entitled to the relief requested in the Complaint.

18. Defendants deny the allegations in this paragraph as untrue and further deny committing any "fraudulent acts" and deny liability for any damages alleged by Plaintiffs.

## **II. THE PARTIES**

### **A. PLAINTIFFS**

19. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

20. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

21. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

22. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

23. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**B. DEFENDANTS**

**1. Inscribed, PLLC**

24. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

25. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

26. Defendants deny the allegations in this paragraph as untrue.

27. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

28. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue

**2. Integrative Neurology, PLLC**

29. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

30. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

31. Defendants deny the allegations in this paragraph as untrue.

32. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

33. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

**3. Diagnostic Solutions, LLC**



34. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

35. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

36. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

37. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

38. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**4. Wook Kim, M.D., d/b/a Farmbrook Interventional Pain & EMG**

39. Admitted only that Wook Kim, M.D., d/b/a Farmbrook Interventional Pain & EMG is a professional services corporation incorporated under the laws of the State of Michigan.

40. Defendants deny the allegations in this paragraph as untrue.

41. Defendants deny the allegations in this paragraph as untrue.

42. Admitted only that Farmbrook conducts business in Southfield, Michigan.

43. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**5. Detroit Institute of Pain Musculoskeletal Medicine, PLLC**

44. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

45. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

46. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

47. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

48. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**6. Michigan Institute of Musculoskeletal Medicine, PLLC**

49. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

50. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

51. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

52. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

53. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**7. ZMC Pharmacy, LLC**

54. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

55. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

56. Defendants deny the allegations in this paragraph as untrue.

57. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

58. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

**8. Integra Lab Management, LLC**

59. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

60. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

61. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

62. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

63. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**9. Gireesh Velugubanti, M.D.**

64. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

65. Defendants deny the allegations in this paragraph as untrue.

66. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

**10. Arvinder Dhillon, M.D.**

67. Admitted only that Dr. Dhillon resides in the State of Michigan.

68. Defendants deny the allegations in this paragraph as untrue.

69. Defendants deny the allegations in this paragraph as untrue.

**11. Bachu Abraham, M.D.**

70. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

71. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

72. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**12. Jalal Zawaideh, R.Ph.**

73. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

74. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

75. Defendants deny the allegations in this paragraph as untrue.

### **III. JURISDICTION AND VENUE**

76. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

77. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

78. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a

legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

79. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

80. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

81. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

82. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

83. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



84. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

85. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

86. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

87. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

88. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

89. Admitted only that Farmbrook is a professional services corporation organized under the laws of the State of Michigan.

90. Admitted only that Farmbrook conducts business in Southfield, Michigan.

91. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

92. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

93. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

94. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

95. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

96. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

97. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

98. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

99. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

100. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

101. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

102. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

103. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains a legal conclusion, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

104. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

105. Admitted that Dr. Dhillon resides in Michigan.

106. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

107. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

108. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. Defendants categorically deny that Plaintiffs are entitled to recover any

alleged damages from Defendants. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

109. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains legal conclusions, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**IV. “BACKGROUND” ON THE DEFENDANTS’ ALLEGED SCHEME TO DEFRAUD**

110. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

111. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

112. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

113. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

114. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

115. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

116. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

117. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

118. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing, conspiracy, or unlawful “*quid pro quo* arrangements” on the part of Defendants, the same are denied as untrue.

119. Defendants deny the allegations in this paragraph as untrue. Defendants specifically deny fabricating “patient head injuries” or any other unlawful or fraudulent conduct alleged by Plaintiffs.

120. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations of wrongdoing or fraud on the part of Defendants, the same are denied as untrue.

121. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

122. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

123. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants or implies admission of wrongdoing by Defendants, the same are denied as untrue.

124. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

125. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

126. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

127. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

128. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

129. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an



alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

130. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

131. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

132. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have

criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

133. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

134. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

135. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

136. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

137. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

138. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

139. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

140. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

141. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

142. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have

criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

143. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

144. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

145. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

146. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

147. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

148. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

149. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

150. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

151. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

152. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have

criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

153. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Plaintiffs' attempts to implicate Defendants in an alleged scheme based on their supposed association with physicians who have criminal or disciplinary histories should be dismissed by the Court as inflammatory, scandalous, and irrelevant.

**V. BILLING FOR SERVICES *ALLEGEDLY* NOT RENDERED**

154. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).



155. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

156. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing or fraud on the part of Defendants, the same are denied as untrue.

157. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing or fraud on the part of Defendants, the same are denied as untrue.

158. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

159. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**A. ALLEGEDLY BILLING FOR EVALUATIONS NOT PERFORMED.**

160. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. In further response, to the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

161. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

162. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

163. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

164. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**B. ALLEGED BILLING FOR AMBULATORY EEGs NOT PERFORMED**

165. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

166. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

167. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

168. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

169. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

170. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

171. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

172. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**C. BILLING FOR NEUROBEHAVIORAL ASSESSMENTS *ALLEGEDLY NOT PERFORMED***

173. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

174. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

175. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

176. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

177. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

178. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

179. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

180. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

181. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

182. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

183. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

184. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

185. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**D. ALLEGEDLY BILLING FOR SURGICAL ASSISTANT SERVICES NOT PERFORMED**

186. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

187. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

188. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

189. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

190. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

191. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**E. SPECIFIC EXAMPLES OF BILLING FOR SERVICES *ALLEGEDLY* NOT RENDERED**

**1. Patient S.G. (Claim No. 0482998035)**

192. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

193. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**2. Patient M.M. (Claim No. 0421745613)**

194. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

195. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

196. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

197. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

198. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



199. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

200. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

201. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

202. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**3. Patient S.H. (Claim No. 0421535188)**

203. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

204. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

205. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

206. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

207. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

208. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

209. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

210. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

211. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**4. Patient R.P. (Claim No. 0461342511)**

212. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

213. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

214. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

215. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

216. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

217. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

218. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

219. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

220. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**5. Patient A.F. (Claim No. 0541405619)**

221. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

222. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

223. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing, fraud, or improper performance of services on the part of Defendants, the same are denied as untrue.

224. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing, fraud, or improper performance of services on the part of Defendants, the same are denied as untrue.

225. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing, fraud, or improper performance of services on the part of Defendants, the same are denied as untrue.

226. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing, fraud, or improper performance of services or improper billing on the part of Defendants, the same are denied as untrue.

227. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing, fraud, or improper performance of services or improper billing on the part of Defendants, the same are denied as untrue.

228. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing, fraud, or improper performance of services or improper billing on the part of Defendants, the same are denied as untrue.

**6. Patient J.M. (Claim No. 0479909185)**

229. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

230. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

231. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

232. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

233. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

234. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

235. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

236. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

237. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**VI. ALLEGEDLY UNLAWFUL AND UNLICENSED TREATMENT AND SERVICES**

**A. ALLEGED UNLICENSED TREATMENT RENDERED BY LIMITED LICENSE PSYCHOLOGISTS**

238. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

239. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

240. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



241. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

242. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

243. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

244. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

245. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

246. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

247. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

248. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

249. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

250. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

251. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

252. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**B. ALLEGED UNLICENSED TREATMENT RENDERED BY PHYSICIAN ASSISTANTS**

253. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

254. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

255. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

256. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

257. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

258. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

259. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

260. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

261. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

262. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

263. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

264. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

265. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of applicable law, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

266. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of applicable law, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

267. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**C. DEFENDANTS ALLEGEDLY FAILED TO OBTAIN THE REQUIRED LICENSURE TO ISSUE DME IN THE STATE OF MICHIGAN**

268. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations of wrongdoing or provision of DME to patients without proper licensure by Defendants, the same are denied as untrue.

269. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

270. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

271. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

272. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

273. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

274. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

275. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

276. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations of wrongdoing or provision of DME to patients without proper licensure by Defendants, the same are denied as untrue.

277. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations of wrongdoing or provision of DME to patients without proper licensure by Defendants, the same are denied as untrue.

278. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations of wrongdoing or provision of DME to patients without proper licensure by Defendants, the same are denied as untrue.

279. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations of wrongdoing on the part of Defendants, the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

## **VII. ALLEGED UNLAWFUL SOLICITATION**

### **A. MICHIGAN'S ANTI-SOLICITATION LAWS**

280. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



281. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

282. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

283. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

284. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

285. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

286. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or improper solicitation on the part of Defendants, the same are denied as untrue.

**B. ALLEGED ILLEGAL SOLICITATION OF MOTOR VEHICLE ACCIDENT VICTIMS**

287. Defendants deny the allegations in this paragraph as untrue.

288. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

289. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

290. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

291. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

292. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

293. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

294. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

295. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form

litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**C. SPECIFIC EXAMPLES OF *ALLEGED* PATIENT SOLICITATION**

296. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

**1. Patient K.L. (Claim No. TXA-0187454)**

297. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

298. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

299. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

300. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

301. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

302. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

303. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**2. Patient S.G. (Claim No. 0482998035)**

304. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

305. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

306. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

307. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

308. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

309. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

310. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**3. Patient T.S. (Claim No. 0461626020)**

311. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

312. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

313. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

314. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

315. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

316. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**4. Patient D.J. (Claim No. TXA-0185605)**

317. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



318. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

319. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

320. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

321. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**5. Patient R.L. (Claim No. TXA-0197188)**

322. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

323. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

324. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

325. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

326. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue.

327. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing or unlawful solicitation on the part of Defendants, the same are denied as untrue. For further response, Defendants

state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**VIII. ALLEGEDLY UNREASONABLE AND UNNECESSARY MEDICAL TREATMENT**

328. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

329. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

330. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

331. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

332. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

333. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations

initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

334. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

335. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**A. ALLEGED PREDETERMINED TREATMENT PROTOCOL**

336. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district

against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

337. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

338. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

339. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

340. Defendants deny the allegations contained in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district

against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

341. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

342. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

343. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

344. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

345. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

346. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

347. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

348. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

349. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

350. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



351. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

352. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

353. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

354. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

355. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

356. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

357. In the manner and form alleged, Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

358. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

359. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

360. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

361. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

362. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

363. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

364. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

365. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

366. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

367. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

368. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

369. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

370. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

371. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

372. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

373. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

374. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

375. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

376. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

377. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

378. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

379. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

380. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

381. In the manner and form alleged, Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

382. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

383. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

384. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

385. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**B. ALLEGED UNNECESSARY AND EXCESSIVE DIAGNOSTIC TESTING**

386. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

387. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

388. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

389. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

390. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

391. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

392. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

393. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



394. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

395. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

396. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

397. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

398. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

399. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

400. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

401. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

402. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

403. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

404. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

405. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

406. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

407. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

408. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

409. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

410. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

411. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

412. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

413. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

414. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

415. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

416. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

417. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

418. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

419. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

420. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**C. ALLEGED UNNECESSARY AND EXCESSIVE USE OF INJECTION PROCEDURES**

421. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

422. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

423. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

424. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

425. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

426. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

427. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

428. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

429. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

430. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

431. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

432. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit



nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

433. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

434. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

435. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

436. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

437. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

438. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

439. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

440. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

441. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

442. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**D. ALLEGED UNNECESSARY AND EXCESSIVE USE OF NEUROFEEDBACK THERAPY**

443. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

444. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

445. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

446. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

447. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

448. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

449. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

450. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

451. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

452. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

453. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

454. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

455. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

456. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

457. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

458. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

459. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**E. ALLEGEDLY MEDICALLY UNNECESSARY MEDICATION**

460. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not

supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

461. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

462. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

**1. Alleged Medically Unnecessary Controlled Substances**

463. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

464. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

465. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

466. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

467. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

468. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

469. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

470. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

**2. Allegedly Medically Unnecessary Compounded Medications**

471. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

472. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.



473. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

474. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

475. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

476. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

477. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

478. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

479. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**3. Other Allegedly Medically Unnecessary Medications**

480. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

481. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

482. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

483. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**F. ALLEGEDLY MEDICALLY UNNECESSARY URINE DRUG TESTING**

484. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

485. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

486. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault

automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

487. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

488. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1. **Allegedly Medically Unnecessary Presumptive Urine Drug Screens**

489. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

490. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

491. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

492. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

493. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

494. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

495. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**2. Allegedly Medically Unnecessary Definitive Urine Drug Testing**

496. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

497. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

498. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

499. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

500. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

501. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

502. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



503. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

504. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

505. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

506. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

507. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

508. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

509. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

510. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

511. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

512. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

513. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

514. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

515. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

516. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

517. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

518. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

519. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

520. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

521. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

522. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

523. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

524. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

525. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

526. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

527. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

528. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

529. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

530. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

531. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

532. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

533. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

534. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

535. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

536. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

537. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

538. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

539. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

**G. ALLEGED SPECIFIC EXAMPLES OF UNREASONABLE AND UNNECESSARY TREATMENT**

**1. Patient S.G. (Claim No. 0482998035)**

540. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

541. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

542. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

543. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

544. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

545. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

546. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

547. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

548. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



549. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

550. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

551. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

552. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

553. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

554. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**2. Patient I.S. (Claim No. 0428425573)**

555. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

556. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

557. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

558. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

559. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

560. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

561. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

562. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

563. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

564. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

565. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

566. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**3. Patient T.S. (Claim No. 0461626020)**

567. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

568. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

569. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

570. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

571. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

572. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

573. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

574. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

575. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to

circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

576. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

577. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**4. Patient S.N. (Claim No. TXA-0178760)**

578. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

579. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

580. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

581. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

582. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

583. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

584. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.



585. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

586. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

587. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

588. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

589. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

590. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

591. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**5. Patient J.F. (Claim No. 0491502597)**

592. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

593. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

594. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

595. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

596. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

597. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

598. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

599. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

600. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

601. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

602. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

603. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

604. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

605. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

606. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

607. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

608. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**6. Patient J.W. (Claim No. TXA-0205887)**

609. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

610. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

611. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

612. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

613. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

614. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

615. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

616. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

617. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

618. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

619. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

620. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

621. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

622. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

623. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

624. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault



automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**7. Patient J.F. (Claim No. TXA-0193637)**

625. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

626. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

627. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

628. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

629. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

630. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

631. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

632. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

633. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

634. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

635. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

636. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

637. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

638. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

639. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

640. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that

this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

641. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**8. Patient D.C. (Claim No. 0556565588)**

642. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

643. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

644. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

645. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

646. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

647. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

648. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

649. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

650. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

651. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

652. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**9. Patient T.A. (Claim No. TXA-0187110)**

653. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

654. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

655. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

656. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

657. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

658. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

659. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit

nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

660. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

661. In the manner and form alleged, Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

662. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to



circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

663. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

664. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

665. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not

supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**IX. ALLEGEDLY FRAUDULENT BILLING PRACTICES**

666. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

667. Defendants deny the allegations contained in this paragraph for the reason that said allegations are untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

668. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

669. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

670. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

671. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**A. ALLEGEDLY IMPROPER BILLING FOR EVALUATIONS**

**1. Allegedly Fraudulently Upcoded Office Visits**

672. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

673. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

674. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

675. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

676. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

677. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

678. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

679. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

680. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

681. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

682. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

683. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

684. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

685. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

686. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

687. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

688. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

689. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

690. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

691. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

692. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

693. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

694. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

695. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

696. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

697. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

698. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

699. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

700. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

701. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph



contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

702. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

703. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

704. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**2. Allegedly Fraudulent Billing for Prolonged Evaluations**

705. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

706. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

707. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

708. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

709. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

710. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

711. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

712. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

713. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

714. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

715. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

716. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

717. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

718. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

719. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

720. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**B. ALLEGEDLY FRAUDULENT BILLING PRACTICE OF UNBUNDLING**

721. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

722. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

723. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

724. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

725. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

726. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

727. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

728. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

729. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

730. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

731. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

732. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

733. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

734. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

735. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

736. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

737. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

738. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**X. ALLEGEDLY EXCESSIVE AND UNREASONABLE CHARGES**

739. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

740. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

741. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

742. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

743. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**A. ALLEGEDLY UNREASONABLE CHARGES FOR PATIENT EVALUATIONS**

744. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).



745. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

746. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

747. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

748. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

749. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

750. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

751. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

752. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

753. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

754. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

755. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

756. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

757. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

758. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

759. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**B. ALLEGEDLY UNREASONABLE CHARGES FOR XEOMIN INJECTIONS**

760. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

761. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

762. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

763. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

764. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

765. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**C. ALLEGEDLY UNREASONABLE CHARGES FOR DIAGNOSTIC TESTING**

766. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

767. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

768. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

769. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

770. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

771. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

772. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

773. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

774. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

775. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

776. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

777. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that Plaintiffs and other no-fault insurers constantly attempt to limit “reasonable” charges to the Medicare reimbursement rates and routinely extort settlements from providers and physicians that include billing moratoriums and/or limit billing to Medicare reimbursement rates.

778. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

779. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**D. ALLEGEDLY UNREASONABLE CHARGES FOR NEUROFEEDBACK THERAPY**

780. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

781. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

782. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

783. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

784. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

785. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**E. ALLEGEDLY UNREASONABLE CHARGES FOR ISSUING DME**



786. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

787. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

788. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

789. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

790. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

791. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

792. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

793. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

794. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

795. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

796. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

797. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against

healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

798. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**F. Allegedly Unreasonable Charges for Dispensing Medication**

799. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

800. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

801. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

802. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

803. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

804. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

805. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

806. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

807. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

808. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

809. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

810. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

811. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

812. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

813. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

814. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

815. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

816. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

817. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

818. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

819. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**XI. ALLEGED MISREPRESENTATIONS MADE BY THE DEFENDANTS  
AND ALLEGEDLY RELIED ON BY ALLSTATE**

**A. ALLEGED MISREPRESENTATIONS BY THE DEFENDANTS**

820. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by



other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

821. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

822. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

823. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

824. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

825. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

826. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

827. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

828. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

829. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

830. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

831. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

832. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

833. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

834. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

835. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**B. ALLSTATE'S ALLEGED JUSTIFIABLE RELIANCE**

836. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

837. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against

healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

838. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

839. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

840. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

841. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

842. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

843. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

## **XII. ALLEGED MAIL AND WIRE FRAUD RACKETEERING ACTIVITY**

844. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

845. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

846. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.



847. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

848. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

849. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

850. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

851. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

852. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

853. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

854. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against

healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

855. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

856. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

857. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

858. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

859. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

860. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

861. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

862. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

863. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

864. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph

contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

865. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

### **XIII. ALLEGED DAMAGES**

866. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

867. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Defendants deny any and all allegations of wrongdoing and liability to Plaintiffs for damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations

initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

868. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Defendants deny any and all allegations of wrongdoing and liability to Plaintiffs for damages in any form or amount.

869. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

870. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

871. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

872. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. Defendants deny any and all allegations of wrongdoing and liability to Plaintiffs for damages in any form or amount.

873. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

874. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

875. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

876. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

877. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Defendants deny any and all allegations of wrongdoing and liability to Plaintiffs for damages in any form or amount.

878. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave



Plaintiffs to their strict proofs. Defendants deny any and all allegations of wrongdoing and liability to Plaintiffs for damages in any form or amount.

879. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Defendants deny any and all allegations of wrongdoing and liability to Plaintiffs for damages in any form or amount.

880. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

881. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

882. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Defendants deny any and all allegations of wrongdoing and liability to Plaintiffs for damages in any form or amount.

883. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. Defendants deny any and all allegations of wrongdoing and liability to Plaintiffs for damages in any form or amount. Significantly, Plaintiffs allege to have investigated “each of the defendants both individually and in connection with the comprehensive scheme,” but clearly did not review and evaluate each individual patient claim as required by the Michigan No Fault Act.

#### **XIV. RESPONSE TO PLAINTIFFS’ ALLEGED CAUSES OF ACTION**

##### **COUNT I**

##### **VIOLATION OF 18 U.S.C. § 1962(c) (Inscribed Enterprise)**

**Against Diagnostic Solutions LLC; Wook Kim, M.D., P.C. d/b/a Farmbrook Interventional Pain & EMG; Detroit Institute of Pain Musculoskeletal Medicine PLLC; ZMC Pharmacy, L.L.C.; Gireesh Velugubanti, M.D.; Arvinder Dhillon, M.D.; Bachu Abraham, M.D.; and Jalal Zawaideh, R.Ph.**

884. Defendants repeat and re-allege those answers given above as if more fully restated herein.

885. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

886. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

887. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

888. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the

Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations or implications of wrongdoing by Defendants, the same are denied as untrue.

889. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. To the extent this paragraph contains allegations or implications of wrongdoing by Defendants, the same are denied as untrue.

890. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault

claims. To the extent this paragraph contains allegations or implications of wrongdoing by Defendants, the same are denied as untrue.

891. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

892. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

893. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

894. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

895. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against

healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

896. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

897. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

898. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

899. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

900. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

901. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

902. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

903. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

904. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

905. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Specifically, Plaintiffs are “in the business” of collecting no-fault insurance premiums and then doing everything in their power, including brazenly violating the Michigan No Fault Act, to avoid paying



benefits for their insureds. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

906. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs' constant violations of the Michigan No Fault Act and abuse of the legal process in Michigan's Courts have a deleterious impact on insureds, the people of the State of Michigan, and insurance rates. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

907. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence

and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT II**  
**VIOLATION OF 18 U.S.C. § 1962(d)**  
**(Inscribed Enterprise)**

**Against Diagnostic Solutions LLC; Wook Kim, M.D., P.C. d/b/a Farmbrook  
Interventional Pain & EMG; Detroit Institute of Pain Musculoskeletal  
Medicine PLLC; ZMC Pharmacy, L.L.C.; Gireesh Velugubanti, M.D.;  
Arvinder Dhillon, M.D.; Bachu Abraham, M.D.; and Jalal Zawaideh, R.Ph.**

908. Defendants repeat and re-allege those answers given above as if more fully restated herein.

909. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

910. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

911. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

912. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

913. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

914. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or

amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

915. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT III**  
**VIOLATION OF 18 U.S.C. § 1962(c)**  
**(Integrative Neurology Enterprise)**  
**Against Diagnostic Solutions LLC; Wook Kim, M.D., P.C. d/b/a Farmbrook**  
**Interventional Pain & EMG; ZMC Pharmacy, L.L.C.; Gireesh Velugubanti,**  
**M.D.; Arvinder Dhillon, M.D.; and Jalal Zawaideh, R.Ph.**

916. Defendants repeat and re-allege those answers given above as if more fully restated herein.

917. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against

healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

918. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

919. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

920. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

921. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

922. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

923. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

924. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

925. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

926. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

927. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

928. In the manner and form alleged, Defendants are without sufficient knowledge to respond to this allegation and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

929. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

930. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

931. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

932. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

933. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by



other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

934. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

935. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

936. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Specifically, Plaintiffs are “in the business” of collecting no-fault insurance premiums and then doing everything in their power, including brazenly violating the Michigan No Fault Act, to avoid paying benefits for their insureds. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

937. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs’ constant violations of the Michigan No Fault Act and abuse of the legal process in Michigan’s Courts have a deleterious impact on insureds, the people of the State of Michigan, and insurance rates. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

938. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT IV**  
**VIOLATION OF 18 U.S.C. § 1962(d)**  
**(Integrative Neurology Enterprise)**  
**Against Diagnostic Solutions LLC; Wook Kim, M.D., P.C. d/b/a Farmbrook**  
**Interventional Pain & EMG; ZMC Pharmacy, L.L.C.; Gireesh Velugubanti,**  
**M.D.; Arvinder Dhillon, M.D.; and Jalal Zawaideh, R.Ph.**

939. Defendants repeat and re-allege those answers given above as if more fully restated herein.

940. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

941. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

942. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

943. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

944. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

945. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

946. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT V**  
**VIOLATION OF 18 U.S.C. § 1962(c)**  
**(Diagnostic Solutions Enterprise)**  
**Against Inscribed PLLC; Integrative Neurology PLLC; and Gireesh**  
**Velugubanti, M.D.**

947. Defendants repeat and re-allege those answers given above as if more fully restated herein.

948. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

949. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

950. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

951. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

952. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

953. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

954. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

955. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

956. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

957. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

958. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

959. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

960. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

961. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

962. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

963. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

964. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

965. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence



and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Specifically, Plaintiffs are “in the business” of collecting no-fault insurance premiums and then doing everything in their power, including brazenly violating the Michigan No Fault Act, to avoid paying benefits for their insureds. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

966. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs’ alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs’ constant violations of the Michigan No Fault Act and abuse of the legal process in Michigan’s Courts have a deleterious impact on insureds, the people of the State of Michigan, and insurance rates. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

967. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**COUNT VI**  
**VIOLATION OF 18 U.S.C. § 1962(d)**  
**(Diagnostic Solutions Enterprise)**  
**Against Inscribed PLLC; Integrative Neurology PLLC; and Gireesh**  
**Velugubanti, M.D.**

968. Defendants repeat and re-allege those answers given above as if more fully restated herein.

969. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

970. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

971. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

972. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

973. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

974. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

975. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**COUNT VII**  
**VIOLATION OF 18 U.S.C. § 1962(c)**  
**(Farmbrook Enterprise)**  
**Against Inscribed PLLC; Integrative Neurology PLLC; ZMC Pharmacy,**  
**L.L.C.; Gireesh Velugubanti, M.D.; Arvinder Dhillon, M.D.; and Jalal**  
**Zawaideh, R.Ph.**

976. Defendants repeat and re-allege those answers given above as if more fully restated herein.

977. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

978. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

979. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

980. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

981. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

982. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

983. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

984. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

985. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

986. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

987. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

988. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

989. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

990. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

991. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

992. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

993. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

994. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

995. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment



(or seek repayment) of valid No-Fault claims. Specifically, Plaintiffs are “in the business” of collecting no-fault insurance premiums and then doing everything in their power, including brazenly violating the Michigan No Fault Act, to avoid paying benefits for their insureds. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

996. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs’ constant violations of the Michigan No Fault Act and abuse of the legal process in Michigan’s Courts have a deleterious impact on insureds, the people of the State of Michigan, and insurance rates. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

997. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs’ alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form

litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT VIII**  
**VIOLATION OF 18 U.S.C. § 1962(d)**  
**(Farmbrook Enterprise)**

**Against Inscribed PLLC; Integrative Neurology PLLC; ZMC Pharmacy,  
L.L.C.; Gireesh Velugubanti, M.D.; Arvinder Dhillon, M.D.; and Jalal  
Zawaideh, R.Ph.**

998. Defendants repeat and re-allege those answers given above as if more fully restated herein.

999. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1000. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1001. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1002. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1003. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1004. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1005. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT IX**  
**VIOLATION OF 18 U.S.C. § 1962(c)**  
**(DIPMM Enterprise)**  
**Against Inscribed PLLC; Integra Lab Management LLC; Gireesh**  
**Velugubanti, M.D.; and Bachu Abraham, M.D.**

1006. Defendants repeat and re-allege those answers given above as if more fully restated herein.

1007. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1008. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1009. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1010. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1011. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1012. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1013. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1014. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1015. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1016. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1017. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1018. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1019. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1020. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1021. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1022. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1023. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1024. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1025. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or

amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Specifically, Plaintiffs are “in the business” of collecting no-fault insurance premiums and then doing everything in their power, including brazenly violating the Michigan No Fault Act, to avoid paying benefits for their insureds. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

1026. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs’ alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs’ constant violations of the Michigan No Fault Act and abuse of the legal process in Michigan’s Courts have a deleterious impact on insureds, the people of the State of Michigan, and insurance rates. (See *US Health Pharmaceuticals DBA Meds Direct et al v.*



*Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

1027. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**COUNT X**  
**VIOLATION OF 18 U.S.C. § 1962(d)**  
**(DIPMM Enterprise)**  
**Against Inscribed PLLC; Integra Lab Management LLC; Gireesh**  
**Velugubanti, M.D.; and Bachu Abraham, M.D.**

1028. Defendants repeat and re-allege those answers given above as if more fully restated herein.

1029. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1030. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1031. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1032. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1033. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1034. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1035. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**COUNT XI**  
**VIOLATION OF 18 U.S.C. § 1962(c)**  
**(MIMM Enterprise)**  
**Against Inscribed PLLC; Detroit Institute of Pain Musculoskeletal Medicine**  
**PLLC; Integra Lab Management LLC; Gireesh Velugubanti, M.D.; and**  
**Bachu Abraham, M.D.**

1036. Defendants repeat and re-allege those answers given above as if more fully restated herein.

1037. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1038. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1039. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1040. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1041. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1042. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1043. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1044. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1045. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1046. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1047. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1048. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1049. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1050. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1051. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1052. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1053. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1054. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1055. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1056. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Specifically, Plaintiffs are “in the business” of collecting no-fault insurance premiums and then doing everything in their power, including brazenly violating the Michigan No Fault Act, to avoid paying benefits for their insureds. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

1057. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs’ constant violations of the Michigan No Fault Act and abuse of the legal process in Michigan’s Courts have a deleterious impact on insureds, the people of the State of Michigan, and insurance rates. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

1058. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**COUNT XII**  
**VIOLATION OF 18 U.S.C. § 1962(d)**  
**(MIMM Enterprise)**  
**Against Incribed PLLC; Detroit Institute of Pain Musculoskeletal Medicine**  
**PLLC; Integra Lab Management LLC; Gireesh Velugubanti, M.D.; and**  
**Bachu Abraham, M.D.**

1059. Defendants repeat and re-allege those answers given above as if more fully restated herein.

1060. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1061. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1062. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1063. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1064. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1065. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1066. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**COUNT XIII**  
**VIOLATION OF 18 U.S.C. § 1962(c)**  
**(ZMC Pharmacy Enterprise)**  
**Against Inscribed PLLC; Integrative Neurology PLLC; Wook Kim, M.D.,**  
**P.C. d/b/a Farmbrook Interventional Pain & EMG; Gireesh Velugubanti,**  
**M.D.; Arvinder Dhillon, M.D.; and Jalal Zawaideh, M.D.**

1067. Defendants repeat and re-allege those answers given above as if more fully restated herein.

1068. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.



1069. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1070. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1071. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1072. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave

Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1073. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1074. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1075. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs. To the extent this paragraph contains allegations or implications of wrongdoing on the part of Defendants, the same are denied as untrue.

1076. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1077. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1078. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1079. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1080. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1081. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1082. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1083. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1084. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Specifically, Plaintiffs are “in the business” of collecting no-fault insurance premiums and then doing everything in their power, including brazenly violating the Michigan No Fault Act, to avoid paying benefits for their insureds. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

1085. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against

healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs' constant violations of the Michigan No Fault Act and abuse of the legal process in Michigan's Courts have a deleterious impact on insureds, the people of the State of Michigan, and insurance rates. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

1086. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT XIV**  
**VIOLATION OF 18 U.S.C. § 1962(d)**  
**(ZMC Pharmacy Enterprise)**  
**Against Incribed PLLC; Integrative Neurology PLLC; Wook Kim, M.D.,**  
**P.C. d/b/a Farmbrook Interventional Pain & EMG; Gireesh Velugubanti,**  
**M.D.; Arvinder Dhillon, M.D.; and Jalal Zawaideh, R.Ph.**

1087. Defendants repeat and re-allege those answers given above as if more fully restated herein.

1088. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1089. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1090. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1091. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1092. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1093. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1094. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the



district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT XV**  
**VIOLATION OF 18 U.S.C. § 1962(c)**  
**(Integra Enterprise)**  
**Against Detroit Institute of Pain Musculoskeletal Medicine PLLC; Michigan**  
**Institute of Musculoskeletal Medicine PLLC; and Bachu Abraham, M.D.**

1095. Defendants repeat and re-allege those answers given above as if more fully restated herein.

1096. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1097. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1098. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1099. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1100. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1101. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1102. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1103. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1104. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1105. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1106. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1107. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1108. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1109. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1110. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1111. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1112. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1113. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**COUNT XVI**  
**VIOLATION OF 18 U.S.C. § 1962(d)**  
**(Integra Enterprise)**  
**Against Detroit Institute of Pain Musculoskeletal Medicine PLLC; Michigan**  
**Institute of Musculoskeletal Medicine PLLC; and Bachu Abraham, M.D.**

1114. Defendants repeat and re-allege those answers given above as if more fully restated herein.

1115. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1116. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1117. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1118. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1119. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1120. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1121. Defendants lack sufficient knowledge or information upon which to base a response to this paragraph and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

**COUNT XVII**  
**COMMON LAW FRAUD**  
**Against All Defendants**

1122. Defendants repeat and re-allege those answers given above as if more fully restated herein

1123. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1124. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1125. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1126. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1127. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1128. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1129. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form

litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT XVIII**  
**CIVIL CONSPIRACY**  
**Against All Defendants**

1130. Defendants repeat and re-allege those answers given above as if more fully restated herein

1131. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1132. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.



1133. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1134. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1135. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1136. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1137. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1138. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

### **COUNT XIX**

#### **PAYMENT UNDER MISTAKE OF FACT**

**Against Inscribed PLLC; Integrative Neurology PLLC; Diagnostic Solutions LLC; Wook Kim, M.D., P.C. d/b/a Farmbrook Interventional Pain & EMG;**

**Detroit Institute of Pain Musculoskeletal Medicine PLLC; Michigan Institute of Musculoskeletal Medicine PLLC; ZMC Pharmacy, L.L.C.; and Integra Lab Management LLC**

1139. Defendants repeat and re-allege those answers given above as if more fully restated herein

1140. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1141. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1142. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form

litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1143. Defendants deny the allegations in this paragraph as untrue and deny any and all allegations of liability for Plaintiffs' alleged damages in any form or amount. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT XX**  
**UNJUST ENRICHMENT**

**Against Inscribed PLLC; Integrative Neurology PLLC; Diagnostic Solutions LLC; Wook Kim, M.D., P.C. d/b/a Farmbrook Interventional Pain & EMG; Detroit Institute of Pain Musculoskeletal Medicine PLLC; Michigan Institute of Musculoskeletal Medicine PLLC; ZMC Pharmacy, L.L.C.; and Integra Lab Management LLC**

1144. Defendants repeat and re-allege those answers given above as if more fully restated herein

1145. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against

healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1146. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1147. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1148. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created

entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1149. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

**COUNT XXI**  
**DECLARATORY RELIEF PURSUANT TO 28 U.S.C. § 2201**  
**Against All Defendants**

1150. Defendants repeat and re-allege those answers given above as if more fully restated herein

1151. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1152. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by

other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1153. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1154. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1155. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1156. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an

inaccurate interpretation of applicable law, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1157. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate interpretation of applicable law, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1158. In the manner and form alleged, Defendants lack sufficient knowledge or information upon which to base a response to this paragraph, which contains an inaccurate rendition of the statute, and so neither admit nor deny same and leave Plaintiffs to their strict proofs.

1159. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1160. Defendants deny the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created



entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims.

1161. Defendants deny that Plaintiffs are entitled to the relief requested herein. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs' sole motivation in filing this lawsuit and seeking declaratory relief is to unlawfully extort from Defendants a billing moratorium that will allow Plaintiffs to continue to collect exorbitant insurance premiums while refusing to pay benefits for its insureds.

1162. Defendants deny that Plaintiffs are entitled to the relief requested herein. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs' sole motivation in filing this lawsuit and seeking declaratory relief is to unlawfully extort from Defendants a billing moratorium that will allow Plaintiffs to continue to collect exorbitant insurance premiums while refusing to pay benefits for its insureds.

1163. Defendants the allegations in this paragraph as untrue. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs' sole motivation in filing this lawsuit and seeking declaratory relief is to unlawfully extort from Defendants a billing moratorium that will allow Plaintiffs to continue to collect exorbitant insurance premiums while refusing to pay benefits for its insureds.

1164. Defendants deny that Plaintiffs are entitled to the relief requested herein. For further response, Defendants state that this lawsuit, and other form litigations initiated by other Michigan no fault automobile insurers throughout the district against healthcare providers is not supported by any factual medical evidence and is created entirely by Plaintiffs to circumvent the Michigan No-Fault Act and avoid payment (or seek repayment) of valid No-Fault claims. Plaintiffs' sole motivation in filing this lawsuit and seeking declaratory relief is to unlawfully extort from Defendants a billing moratorium that will allow Plaintiffs to continue to collect exorbitant insurance premiums while refusing to pay benefits for its insureds.

**XV. RESPONSE TO PLAINTIFFS' DEMAND FOR RELIEF**

WHEREFORE, Defendants pray this action be dismissed in its entirety, the relief requested by Plaintiffs be denied, and that Defendants be awarded their costs, interest, and attorney fees so wrongfully sustained for having to defend this baseless claim, which attempts to circumvent the No Fault Act and avoid Plaintiffs' statutory responsibility under said Act, and such other and further relief as is consistent with equity and good conscience.

**DEFENDANTS' AFFIRMATIVE DEFENSES  
TO PLAINTIFFS' COMPLAINT**

NOW COME Defendants Wook Kim, M.D., P.C., d/b/a Farmbrook Interventional Pain & EMG ("Farmbrook") and Dr. Arvinder Dhillon, M.D. ("Dr. Dhillon") (together "Defendants"), by and through their attorneys, and for their Affirmative Defenses to Plaintiffs' Complaint state as follows:

1. Plaintiffs' Complaint is subject to dismissal, in whole or in part, for the reason that Plaintiffs failed to sufficiently plead a cause of action in accordance with state and/or federal rules.
2. Plaintiffs' Complaint is subject to dismissal, in whole or in part, for Plaintiffs' failure to state a claim for which relief may be granted.

3. Plaintiffs' Complaint is subject to dismissal, in whole or in part, based upon the applicable statute of limitations, laches, statute of repose and/or the "one year back" statute of limitations set forth in MCL § 500.3145(1).

4. Plaintiffs' Complaint is subject to dismissal, in whole or in part, for the reason that Plaintiffs lack standing pursuant to the clear and ambiguous language of MCL § 500.4501, *et seq.*

5. Plaintiffs' Complaint is subject to dismissal, in whole or in part, for the reason that Plaintiffs cannot show "reasonable reliance" under the standard established in *Cooper v. Auto Club Insurance Assoc.*, 481 Mich. 399; 751 N.W.2d 443 (2008) and *Johnson v Wausau Ins Co.*, 283 Mich App 636, 769 NW2d 755 (2009).

6. Plaintiffs' Complaint is subject to dismissal, in whole or in part, pursuant to MCL § 500.3175 for a multitude of reasons, including but not limited to the fact that the statute of limitations has expired and Plaintiffs lack standing to assert any claim for the recovery of benefits paid for the benefit of an individual assigned to Plaintiffs for coverage and for which Plaintiffs received reimbursement from the Assigned Claims Facility.

7. Plaintiffs' Complaint is subject to dismissal, in whole or in part, for the reason that Plaintiffs' Complaint contains claims which are actually medical and/or ordinary negligence claims and Plaintiffs lack standing to pursue such claims; failed

to comply with any applicable pre-suit notice requirements; failed to attach required affidavits from qualified health care practitioners and otherwise failed to properly plead or preserve any cause of action which depends upon Defendants' failure adhere to applicable professional standards.

8. Plaintiffs' Complaint is subject to dismissal, in whole or in part, based upon the doctrines of unclean hands, promissory estoppel, laches, equitable estoppel, comparative negligence, immunity, assumption of the risk, compromise and settlement, release, election of remedies, failure to join claims or defenses in other litigation, failure to mitigate its damages, the fact that Plaintiffs are not the real parties in interest, and waiver.

9. Plaintiffs' Complaint is subject to dismissal, in whole or in part, under the doctrines of res judicata and/or collateral estoppel.

10. Plaintiffs' Complaint is subject to dismissal, in whole or in part, by the Economic Loss Rule/Doctrine.

11. Plaintiffs' Complaint is subject to dismissal, in whole or in part, pursuant to the Doctrine of Election of Remedies.

12. Plaintiffs' Complaint is subject to dismissal, in whole or in part, based upon prior judgment, release, settlement, arbitration or other resolution of claims between Plaintiffs and individual claimants for which Plaintiffs are now seeking reimbursement.

13. Plaintiffs' claims may be barred by their own prior breaches of contract, failure to timely exercise due care, violations of statutory obligations, violations of their duty of good faith and fair dealing, interferences and by their unclean hands and inequitable conduct.

14. Plaintiffs lack standing to assert some or all of the allegations made against Defendants regarding illegality and/or the unlawful providing of services. (*Allstate Ins Co v Global Medical Billing, Inc, et al*, US Dist Court, ED Mich, Southern Division, Case No. 09-14975, Hon. Lawrence P. Zatkoff).

15. Plaintiffs have failed to mitigate their damages.

16. That, assuming any of Plaintiffs' allegations are true, which is denied in its entirety, Plaintiffs have failed to mitigate their damages by unreasonably continuing to issue payments to Defendants when Plaintiffs reasonably knew or should have known that such payments were not warranted pursuant to the holdings in *Cooper v. ACIA*, 481 Mich. 399, 751 N.W.2d 443 (2008).

17. Plaintiffs' claims against these Defendants are improperly joined.

18. Plaintiffs' claims are barred pursuant to MCL § 500.3112.

19. To the extent Plaintiffs' claims result from the actions or inactions of other parties or defendant(s), Defendants have no liability for such actions/inactions.

20. Defendants are entitled to attorney fees per MCL § 500.3148. Defendants reserve all defenses set forth in MCL 500.3101, *et seq.*

21. Defendants did not make any misrepresentations nor commit fraud.

22. Defendants did not pursue any amount greater than that which Plaintiffs determined was reasonable and customary for the services provided to the subject patients.

23. Plaintiffs' claim for declaratory relief pursuant to 28 U.S.C. §2201 is an attempt to circumvent the statutory scheme set forth in MCL § 500.3101, *et seq.*

24. Plaintiffs' exclusive remedy for the actions alleged against Defendants are controlled by the regulatory procedures set forth in MCL § 500.3101, *et seq.*

25. Plaintiffs' claims are barred for their failure to plead fraud as required by Fed. R. Civ. P. 9.

26. Plaintiffs' actions are an attempt to circumvent the Michigan No-Fault Act and should be dismissed as a matter of law. (See *US Health Pharmaceuticals DBA Meds Direct et al v. Allstate Insurance Company et al*, Case No. 20-cv-10348, pending in the United States District Court for the Eastern District of Michigan).

27. Defendants reserve the right to alter, amend or supplement these Affirmative Defenses, and to bring any counterclaims, cross claims and/or third party claims, during or upon the completion of discovery, said reservations being necessary because the allegations in the Complaint do not offer sufficient specifics to notify Defendants of the nature of the claims being made against them.

WHEREFORE, Defendants pray this action be dismissed in its entirety, the relief requested by Plaintiffs be denied, and that Defendants be awarded their costs, interest, and attorney fees so wrongfully sustained for having to defend this baseless claim, which attempts to circumvent the No Fault Act and avoid Plaintiffs' statutory responsibility under such Act, and such other and further relief as is consistent with equity and good conscience.

### **DEMAND FOR JURY TRIAL**

Defendants hereby demand a trial by jury and rely upon the Demand for Jury Trial made by Plaintiffs in the Complaint.

Respectfully submitted,

JOELSON ROSENBERG PLC

/s/ Peter W. Joelson

Peter W. Joelson (P51468)

[pwj@jrlawplc.com](mailto:pwj@jrlawplc.com)

Emily Warren (P76675)

[ewarren@jrlawplc.com](mailto:ewarren@jrlawplc.com)

*Co-Counsel for Defendants*

30665 Northwestern Hwy., Ste 200

Farmington Hills, MI 48334

(248) 626-9966 fax: (248) 855-9496

LAW OFFICES OF GARY R. BLUMBERG,  
PC

/s/ Gary R. Blumberg

Gary R. Blumberg (P29820)

[grblumberg@blumbergpc.com](mailto:grblumberg@blumbergpc.com)

*Co-Counsel for Defendants*

15011 Michigan Ave.

Dearborn, MI 48126

(313) 230-1121

Dated: February 28, 2020



**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document along with a Certificate of Service was electronically filed on February 28, 2020, with the Court's e-filing system, which will send notification of such filing to all attorneys of record.

/s/ Emily R. Warren  
Emily R. Warren